

Silk Renewal Spray between January 26, 2013 and the present (“New York Class”); and

California Class: All persons who reside in the state of California and purchased Matrix Biolage Advanced Keratindose Pro-Keratin + Silk Shampoo, Pro-Keratin + Silk Conditioner, and/or Pro-Keratin + Silk Renewal Spray between January 26, 2013 and the present. (“California Class”).

Plaintiffs further respectfully move before the Honorable Lorna G. Schofield, pursuant to Rule 23 of the Federal Rules of Civil Procedure, to (1) appoint Plaintiffs Brandi Price and Christine Chadwick as representatives of the Nationwide Class; (2) appoint Plaintiff Brandi Price as representative of the New York Class; (3) appoint Plaintiff Christine Chadwick as representative of the California Class; and (4) appoint the law firms of Morgan & Morgan Complex Litigation Group, Barbat, Mansour & Suciu PLLC, Greg Coleman Law, Sommers Schwartz P.C., and JTB Law Group, LLC as Class Counsel.

In support of this Motion, Plaintiffs ask that the Court consider the accompanying memorandum of law, supporting exhibits, accompanying Declaration of Rachel Soffin and the exhibits thereto, the pleadings on file, and oral argument as may be heard.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court’s Scheduling Order dated December 20, 2017 (Doc. No. 96), Defendants’ opposition to this Motion, if any, must be served on or before February 20, 2018, and Plaintiffs’ reply papers in further support of this Motion must be served on or before March 5, 2018. Plaintiffs hereby request oral argument on the instant Motion.

Dated: January 5, 2018

Respectfully submitted,

**MORGAN & MORGAN
COMPLEX LITIGATION GROUP**

/s/ Rachel Soffin

Rachel Soffin (*pro hac vice*)

Jonathan B. Cohen (*pro hac vice*)

201 N. Franklin St., 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505
Facsimile: (813) 222-2434
rsoffin@forthepeople.com
jcohen@forthepeople.com

BARBAT, MANSOUR & SUCIU PLLC

Nick Suciu III (*pro hac vice*)
1644 Bracken Rd.
Bloomfield Hills, Michigan 48302
Telephone: (313) 303-3472
nicksuciu@bmslawyers.com

SOMMERS SCHWARTZ P.C.

Jason Thompson (*pro hac vice*)
Rod Johnston (*pro hac vice*)
One Towne Square, 17th Floor
Southfield, Michigan 48076
Telephone: (248) 355-0300
jthompson@sommerspc.com
rjohnston@sommerspc.com

GREG COLEMAN LAW

Greg Coleman (*pro hac vice*)
800 S. Gay Street, Suite 1100
Knoxville, Tennessee 37929
Telephone: (865) 247-0080
greg@gregcolemanlaw.com

JTB LAW GROUP, LLC

Jason T. Brown (JB6579)
Patrick S. Almonrode (PA0428)
155 2nd Street, Suite 4
Jersey City, New Jersey 07302
Telephone: (877) 561-0000
jtb@jtblawgroup.com
patalmonrode@jtblawgroup.com

Attorneys for Plaintiffs and putative Class Members

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 5, 2018, I submitted the foregoing to the United States District Court for the Southern District of New York via electronic mail and copied all counsel of record in the case.

/s/ Rachel Soffin

Rachel Soffin